

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**FOURTH SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE
(UPS/USPS-16 through UPS/USPS-17)**

(August 20, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatory and request for production of documents directed to the United States Postal Service (UPS/USPS-16 through UPS/USPS-17).

Respectfully submitted,



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Of Counsel.

**INTERROGATORY OF UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE**

UPS/USPS-16. Please refer to your responses to UPS/USPS-T15-5 and UPS/USPS-T15-6 (redirected from witness Patelunas).

(a) How and to what extent has the use of postal packs affected the costs associated with moving empty equipment?

(b) To what extent are postal packs used for sacks and trays?

UPS/USPS-17. Please refer to your response to UPS/USPS-T15-7 (redirected from witness Patelunas), where you state, "Cost savings are expected from IMHS as a result of increased containerized loads. IMHS consists primarily of mechanized pallet loaders and unloaders, transport equipment, and other equipment (e.g. forklifts) applicable to the movement of pallets and containerized loads."

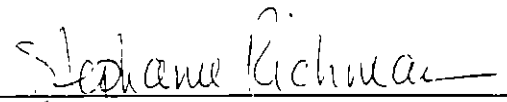
(a) Please explain what "containerized" means, i.e., what type(s) of containers are used?

(b) Please provide a list of the type(s) of transport equipment included in IMHS.

(c) In addition to forklifts, please provide a list of the "other equipment" included in IMHS.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in
accordance with section 12 of the Commission's Rules of Practice.



Stephanie Richman

Dated: August 20, 1997
Philadelphia, Pa.